



## ETHICAL CONDUCT POLICY

Section 1: Purpose

The purpose of this code is to outline the measures taken to ensure Ethical Conduct is maintained within the company.

Section 2: Scope

This document applies throughout USSL on all contracts carrying out all services.

Section 3: Introduction

USSL operates its business in accordance with a number of general principles which are set out in this Code of Ethical Conduct. The purpose of these principles is to support the development of a sound and successful business which respects the needs of all stakeholders, and other people affected by our activities. The Company expects the standards set out in this code to be applied in all of the projects with which it is involved. In addition, we will endeavour to ensure that our sub-contractors abide by the principles of our Code of Ethical Conduct. The six general principles are as follows:-

- USSL will ensure compliance with all legislative requirements applicable to the areas of our business and countries in which we are active, both in terms of bidding for new business and in implementing projects once they have been awarded.
- USSL are committed to carrying out our business with high standards of integrity and ethics; avoiding unfair anti-competitive practices, ensuring any Company information is maintained in a confidential and securely manner, and at all times avoiding all forms of corruption and bribery. Employees should declare any outside business interests and any conflicts of interest which may arise.
- USSL is committed to safeguarding the health and safety of our employees, of others who carry out work on our behalf and of those who may be affected by our work. The Company maintains a documented health and safety management system at every level to describe how these issues are dealt with in practice. We regularly monitor the health and safety performance of all our projects, including key subcontractors working on those projects.
- USSL maintains a working environment where all employees are treated with dignity and respect. We are committed to providing equal opportunities for all employees regardless of their race, colour, ethnic origin, religious belief, sex, sexual orientation, marital status, age, nationality, or disability. We are committed to engaging in open communication with our employees. Bullying and Harassment in any form will not be tolerated within the company.
- Given the long-term nature of many of the Company's projects, and the need to work closely with local authorities and local communities, the environment is an important consideration in all of the Company's activities. We are committed to preventing pollution, to comply with all relevant legal requirements as well as the specific requirements of our Clients and to undertake a positive action programme by setting annual objectives and targets. Furthermore, we seek continual improvement and the promotion of good and sustainable environmental behaviour in our staff, partners and contractors with whom we work.
- USSL value constructive criticism and therefore will listen to and respond to reasonable enquires raised by external parties who are affected by our activities, and will communicate with them in a timely manner. USSL will engage with our stakeholders in communicating this code and ensure where necessary the code will be subject to internal and external audit.

The Company will review this Code of Ethical Conduct on a regular basis and will introduce revisions where necessary.

Section 4: Document History

October 2016 New Document
December 2018 Revision